

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SARAH PALIN, an individual,

No. 17 Civ. 4853

Plaintiff,

Hon. Jed S. Rakoff

– against –

THE NEW YORK TIMES COMPANY,
a New York corporation, and JAMES
BENNET, an individual,

ECF Case

Defendant.

DECLARATION OF SHANE B. VOGT

SHANE B. VOGT, pursuant to 28 U.S.C. § 1746, hereby declares and says:

1. I am an attorney licensed to practice law in the State of Florida, specially admitted to practice in this Court [Doc. 13] and a partner in the law firm of Bajo Cuva Cohen Turkel, P.A., counsel of record for plaintiff in the above-captioned matter, Sarah Palin.

2. I submit this Declaration in support of Plaintiff's Memorandum of Law in Support of Motion for Partial Summary Judgment [Doc. 100].

3. Attached hereto as **Exhibit A** is a true and authentic copy of an article entitled "*The last decade showed how social medial could topple governments and make social change – it's only getting crazier from here,*" which can be found at <https://www.businessinsider.com/social-media-activism-facebook-twitter-youtube-power-2019-12>.

4. Attached hereto as **Exhibit B** is a true and authentic copy of an article entitled "*Social Media Transformed Teens' Ability to Build Activist Movements Online,*" which can be found at <https://www.teenvogue.com/story/social-media-activism-changed->

everything#:~:text=Social%20Media%20Transformed%20Teens%20Ability%20to%20Build%20Activist%20Movements%20Online,-
To%20mark%20the&text=She%20told%20Teen%20Vogue%20she, and%20that%20existed%20for%20them.%E2%80%9D.

5. Attached hereto as **Exhibit C** is a true and authentic copy of an article entitled “*Social media is the new heart of political protests*,” which can be found at <https://apnews.com/b31f49aa9610429488ebad63caa63f6d/Social-media-is-the-new-heart-of-political-protests>.

6. Attached hereto as **Exhibit D** is a true and authentic copy of an article entitled “*March for Our Lives was Born on Social Media*,” which can be found at <https://www.brandwatch.com/blog/march-for-our-lives-social-media/>.

7. Attached hereto as **Exhibit E** is a true and authentic copy of an article entitled “*The Woman’s March: Why We Marched*,” which can be found at <https://www.brandwatch.com/blog/womens-march-why-we-marched/>.

8. Attached hereto as **Exhibit F** is a true and authentic copy of an article entitled “*George Floyd Video – Teen Who Recorded It... GETTING PSYCHOLOGICAL HELP*,” which can be found at <https://www.tmz.com/2020/06/02/george-floyd-video-teen-witness-getting-therapy-helping-investigation/>.

9. Attached hereto as **Exhibit G** is a true and authentic copy of an article entitled “*Who Is Darnella Frazier, the 17-Year-Old Who Filmed George Floyd’s Fatal Arrest?*,” which can be found at <https://www.insideedition.com/who-is-darnella-frazier-the-17-year-old-who-filmed-george-floyds-fatal-arrest-60134>.

10. Attached hereto as **Exhibit H** is a true and authentic copy of an article entitled “*King’s Letter from Birmingham Jail, 50 Years Later,*” which can be found at <https://www.history.com/news/kings-letter-from-birmingham-jail-50-years-later>.

11. Attached hereto as **Exhibit I** is a true and authentic copy of an article entitled “*Harvey Shapiro, Poet and Editor, Dies at 88,*” which can be found at <https://www.nytimes.com/2013/01/08/books/harvey-shapiro-poet-of-new-york-and-beyond-dies-at-88.html>.

12. Attached hereto as **Exhibit J** is a true and authentic copy of *Wikipedia* page for Greta Thunberg, which can be found at https://en.wikipedia.org/wiki/Greta_Thunberg.

13. Attached hereto as **Exhibit K** is a true and authentic copy of an article entitled “*Greta Thunberg’s Online Attackers Reveal a Grim Pattern,*” which can be found at <https://www.wired.com/story/greta-thunberg-online-harassment/>.

14. Attached hereto as **Exhibit L** is a true and authentic copy of an article entitled “*Online haters are targeting Greta Thunberg with conspiracy theories and fake photos,*” which can be found at <https://www.usatoday.com/story/news/nation/2019/10/02/climate-change-activist-greta-thunberg-targeted-online-trolls/3843196002/>.

15. Attached hereto as **Exhibit M** is a true and authentic copy of an article entitled “*The School Shooting Generation Has Had Enough,*” which can be found at <https://time.com/longform/never-again-movement/>.

16. Attached hereto as **Exhibit N** is a true and authentic copy of an article entitled “*CAMERON KASKY, JACLYN CORIN, DAVID HOGG, EMMA GONZALEZ AND ALEX WIND,*” which can be found at <https://time.com/collection/most-influential-people-2018/5217568/parkland-students/>.

17. Attached hereto as **Exhibit O** is a true and authentic copy of an article entitled “*Parkland Students Find Themselves Targets of Lies and Personal Attacks*,” which can be found at <https://www.nytimes.com/2018/03/27/us/parkland-students-hogg-gonzalez.html>.

18. Attached hereto as **Exhibit P** is a true and authentic copy of an article entitled “*The Sliming of David Hogg and Emma Gonzalez*,” which can be found at <https://www.gq.com/story/the-sliming-of-david-hogg-and-emma-gonzalez>.

19. Attached hereto as **Exhibit Q** is a true and authentic copy of the *Twitter* Terms of Service, which can be found at <https://twitter.com/en/tos>.

20. Attached hereto as **Exhibit R** is a true and authentic copy of the *Facebook* Terms of Service, which can be found at <https://www.facebook.com/terms.php>.

21. Attached hereto as **Exhibit S** is a true and authentic copy of the *Facebook* Community Standards, which can be found at <https://www.facebook.com/communitystandards/>.

22. Attached hereto as **Exhibit T** is a true and authentic copy of *Facebook* Community Standards, Section IV.21 False News, which can be found at https://www.facebook.com/communitystandards/false_news.

23. Attached hereto as **Exhibit U** is a true and authentic copy of an article entitled “*Hard Questions: What’s Facebook’s Strategy for Stopping False News?*,” which can be found at <https://about.fb.com/news/2018/05/hard-questions-false-news/>.

24. Attached hereto as **Exhibit V** is a true and authentic copy of the *Instagram* Terms of Use, which can be found at <https://help.instagram.com/581066165581870>.

25. Attached hereto as **Exhibit W** is a true and authentic copy of an article entitled “*60 Incredible and Interesting Twitter Stats and Statistics*,” which can be found at <https://www.brandwatch.com/blog/twitter-stats-and->

statistics/#:~:text=There%20are%20330m%20monthly%20active,users%20write%2080%25%20of%20tweets.

26. Attached hereto as **Exhibit X** is a true and authentic copy of an article entitled “*Americans favor mobile devices over desktops and laptops for getting news,*” which can be found at <https://www.pewresearch.org/fact-tank/2019/11/19/americans-favor-mobile-devices-over-desktops-and-laptops-for-getting-news/>.

27. Attached hereto as **Exhibit Y** is a true and authentic copy of an article entitled “*Social media outpaces print newspapers in the U.S. as a news source,*” which can be found at <https://www.pewresearch.org/fact-tank/2018/12/10/social-media-outpaces-print-newspapers-in-the-u-s-as-a-news-source/>.

28. Attached hereto as **Exhibit Z** is a true and authentic copy of an article entitled “*The spread of true and false news online,*” which can be found at <https://science.sciencemag.org/content/359/6380/1146/tab-pdf>.

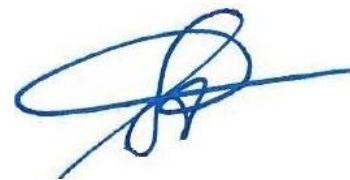
29. Attached hereto as **Exhibit AA** is a true and authentic copy of an article entitled “*How Fake News Goes Viral: A Case Study,*” which can be found at <https://www.nytimes.com/2016/11/20/business/media/how-fake-news-spreads.html>.

30. Attached hereto as **Exhibit BB** is a true and authentic copy of an article entitled “*The Grim Conclusions of the Largest-Ever Study of Fake News,*” which can be found at <https://www.theatlantic.com/technology/archive/2018/03/largest-study-ever-fake-news-mit-twitter/555104/>.

I HAVE READ EVERY STATEMENT MADE IN THIS DECLARATION AND DECLARE
UNDER PENALTY OF PERJURY THAT EACH STATEMENT IS TRUE AND CORRECT.

June 19, 2020

Date



SHANE VOGT